

UNITED STATES DISTRICT COURT
WESTERN DIVISION OF TEXAS
WACO TEXAS DIVISION

AUGUST 25, 2021

David Edward Rapp
Plaintiff

FILED
AUG 25 2021
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY [Signature]
DEPUTY CLERK

6.21 cv 885

V.

Michelle Tinsley, Nurse Clinician, V.A. Waco, Tx.
Srikanth Bandela, M.D., V.A. Waco, Tx.
Michael L. Kieffer, Director, Central Tx., Veterans Affairs Hospital, Temple Tx.
Veterans Affairs Division, United States Government, Washington D.C.

MOTION FOR CIVIL SUIT

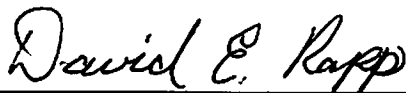
1. Now comes the Plaintiff, David Edward Rapp with motion for civil suit against the above named individuals and entities herein to be identified as Defendants.
2. In support of this Motion for Civil Suit, the Plaintiff encloses a copy of criminal complaint filed with: The Office of Inspector General, Veterans Affairs, Criminal Complaint Division. The medical malpractice(s) perpetrated by the Defendants and ensuing criminal conduct in support of the charges of medical malpractice are detailed in the complaint.
3. The Plaintiff also states in support of Civil Suit, that his rights as a protected class, Disabled person, veteran, under the auspices of the Americans with Disabilities Act have been violated on six occasions.

4. The Plaintiff hereby petitions the court that all named Defendants be held liable and the maximum statutory award of \$600,00.00, \$100,000.00 per occurrence as defined by law within the A.D.A. applicable law and guidelines.

5. The Plaintiff is due to become paraplegic from the waist down at any time. Due to the ongoing malpractice of the Defendants, we further petition the court for award in the amount of \$25,000,000.00. This would afford the Plaintiff to pursue medical care in a civilian setting for the remainder of his life, especially after paralysis sets in. The Plaintiff was counseled by previous primary care physician D. Reddy, he will require both a Colostomy and Urostomy. Exhibits 2 and 3 in support of medical condition, with other records from the V.A. through discovery proceedings.

6. That the V.A. be responsible for Plaintiff's continued medications and psychological needs, either through direct care or by remuneration award to be determined by the jury separate from award requested in item five (5).

7. With this action, plaintiff request reimbursement of attorney fee's and court cost in this matter.



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